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Attorney for Defendant
JOSHUA IVARSON

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSHUA IVARSON,

Defendant.

No. 2:24-cr-0301 DJC

STIPULATION REGARDING
CONTINUANCE OF SENTENCING AND
NEW DISCLOSURE DATES; FINDINGS
AND ORDER

STIPULATION

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorney JASON HITT, and the Defendant, JOSHUA IVARSON, by and through his counsel of record TASHA PARIS CHALFANT, hereby stipulate and request that the Court make the following findings and Order as follows:

1. By previous order, this matter was set for sentencing before Judge Daniel J. Calabretta on November 20, 2025.

2. By this stipulation, the defendant now moves to reset the sentencing from November 20, 2025 to January 29, 2026, and to reset the disclosure dates.

3. The parties agree and stipulate, and request that the Court find the following:

STIPULATION AND ORDER FOR CONTINUANCE OF SENTENCING

1 a. According to the PSR disclosure dates, the draft PSR was timely filed. The informal
2 objections were due on October 23, 2025.

3 b. Counsel promptly arranged for the draft PSR to be mailed to Mr. Ivarson who is
4 housed at the Butte County Jail. This facility does not have any Zoom or remote type of visit
5 options, so counsel needs to travel to Butte County to visit Mr. Ivarson.

6 c. The draft PSR contained extensive criminal history data which counsel needs to
7 investigate. A significant amount of effort needs to be expended in order to prepare the informal
8 objections with Mr. Ivarson.

9 d. Counsel for the defendant requires additional time to thoroughly review the draft
10 PSR with Mr. Ivarson, research and prepare informal objections, consult with her client and
11 relevant experts/providers, and to discuss the next stages of sentencing.

12 g. Counsel for the defendant believes that failure to grant the above-requested
13 continuance would deny her the reasonable time necessary for effective preparation, taking into
14 account the exercise of due diligence.

15 h. The government and probation do not object to the continuance.

16 i. Based on the above, the defense requests the following new sentencing date along
17 with new disclosure dates:

18 Judgment and Sentencing: January 29, 2026

19 Reply, or Statement of Non-Opposition: January 22, 2026

20 Formal Objections to the PSR: January 15, 2026

21 Final PSR: January 8, 2026

22 Counsel's Informal Objections: January 1, 2026

23 All counsel has reviewed this proposed order and authorized Tasha Chalfant to sign it on
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1 their behalf.

2 IT IS SO STIPULATED.

3 Dated: October 29, 2025

by: /s/Tasha Chalfant for
JASON HITT
Assistant U.S. Attorney
Attorney for Plaintiff

6 Dated: October 29, 2025

by: /s/Tasha Chalfant
TASHA CHALFANT
Attorney for Defendant
JOSHUA IVARSON

ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

The Court orders that the sentencing currently scheduled for November 20, 2025 be continued to January 29, 2026, along with the following new disclosure dates:

Judgment and Sentencing:	January 29, 2026
Reply, or Statement of Non-Opposition:	January 22, 2026
Formal Objections to the PSR:	January 15, 2026
Final PSR:	January 8, 2026
Counsel's Informal Objections:	January 1, 2026

IT IS SO FOUND AND ORDERED this 29th day of October, 2025.

/s/ Daniel J. Calabretta
HON. DANIEL J. CALABRETTA
UNITED STATES DISTRICT COURT JUDGE